

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JANICE M. LAWRENCE,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 03-12610-WGY
	)	
AVAYA INC.,	)	
	)	
Defendant.	)	
	)	

**JOINT MOTION TO ENTER  
STIPULATED PROTECTIVE ORDER GOVERNING THE DISCLOSURE AND USE  
OF CONFIDENTIAL DOCUMENTS AND OTHER INFORMATION**

Pursuant to Fed. R. Civ. P. 26(c), all parties to this action respectfully request that the Court adopt and approve the Stipulated Protective Order Governing the Disclosure and Use of Confidential Documents and Other Information which is attached hereto as Exhibit 1 (the "Stipulated Protective Order"). In support of this motion, the parties state as follows:

1. The parties' Stipulated Protective Order concerns the treatment of and access to confidential and proprietary business information which may be produced during the course of this litigation. All parties have recognized that certain information and materials may be considered confidential.

2. The Court should enter a protective order in accordance with the Stipulated Protective Order so as to preserve the parties' agreement and to serve the interests of justice and judicial economy by avoiding unnecessary discovery disputes concerning confidential information.

3. All parties assent to this Motion.

Respectfully submitted,

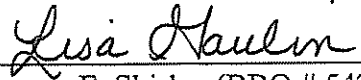
JANICE M. LAWRENCE

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By her attorney,

By its attorneys,

  
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